

- To repair the specific points of the cast iron plumbing system from which water escaped, it is necessary to tear out and remove portions of the home to gain access to the entire failed cast iron plumbing system. No other method of repair is proper. A fix to only part of the failed plumbing system is not adequate or possible.

b. The facts or data considered by the witness in forming them;

Conversation with Sr. Plumber Jimmy Rooker:

c. Any exhibits that will be used to summarize or support them;

- Videos and Photographs by **Draingo of Mississippi**
- Report by **Draingo of Mississippi**
- Estimate for Repairs by **Draingo of Mississippi**

d. The witness's qualifications, including a list of all publications authorized in the previous 10 years;

See attached resume.

e. A list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition;

None.

f. A statement of the compensation to be paid for the study and testimony in the case;

\$225/hour



8/24/2022

Sonya Jones

CERTIFICATE OF SERVICE

I hereby certify that on August 25th, 2022, a true and correct copy of the foregoing was delivered to all counsel for parties at interest in this cause via U.S. mail and electronic mail:

**JAMES R. TOMKINS, 11161
SMITH & TOMKINS
25 Century Boulevard, Suite 606**

Nashville, TN 37214
(615) 256-1280
jtomkins@smithtomkins.com

Attorney for Defendant

/s/ **Alex S. Fisher**

Alex S. Fisher (BPR #31391)

MORGAN & MORGAN – NASHVILLE

1 - JONES RESUME

SONYA JONES

MEMPHIS TN 901.493.7870
sonya@draingoplumbing.com

Experienced residential and commercial construction and plumbing since 1996

EXPERIENCE

DATES FROM – 2008 TO PRESENT

OWNER, DRAINGO OF MS LLC

Plumbing manager overseeing plumbing installation of residential and commercial service. Hiring and training all employees.

DATES FROM – 2002 TO 2008

MANAGER AND APPRENTICE PLUMBER, DRAINGO LLC

- Managing and part of servicing and replacing hot water tanks, garbage disposals, pressure regulating valves, repair & replace toilets
- Fixing leaks and unclogging drains, install, repair/replace water supply lines, unclog sewer lines, repair/replace fixture drains/pipe threading
- Experience in all general plumbing

DATES FROM – 1996 TO 2002

TEI CONSTRUCTION SERVICES INC.

Providing on site construction services for the installation, repair, alteration and maintenance of boilers and boiler related equipment.

EDUCATION

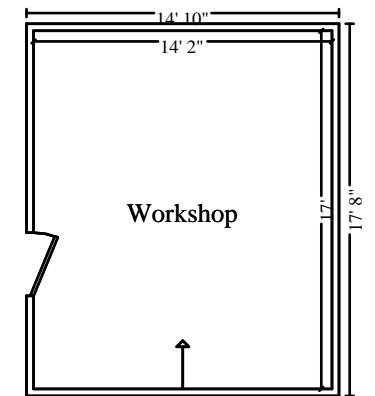
2015

EARNED MASTER MECHANICAL LICENSE (CMC-A) IN MS

2016

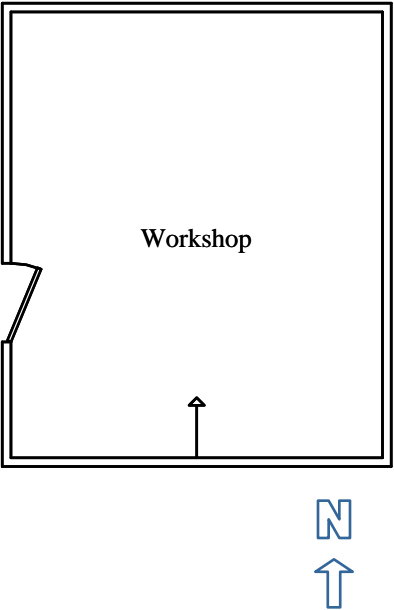
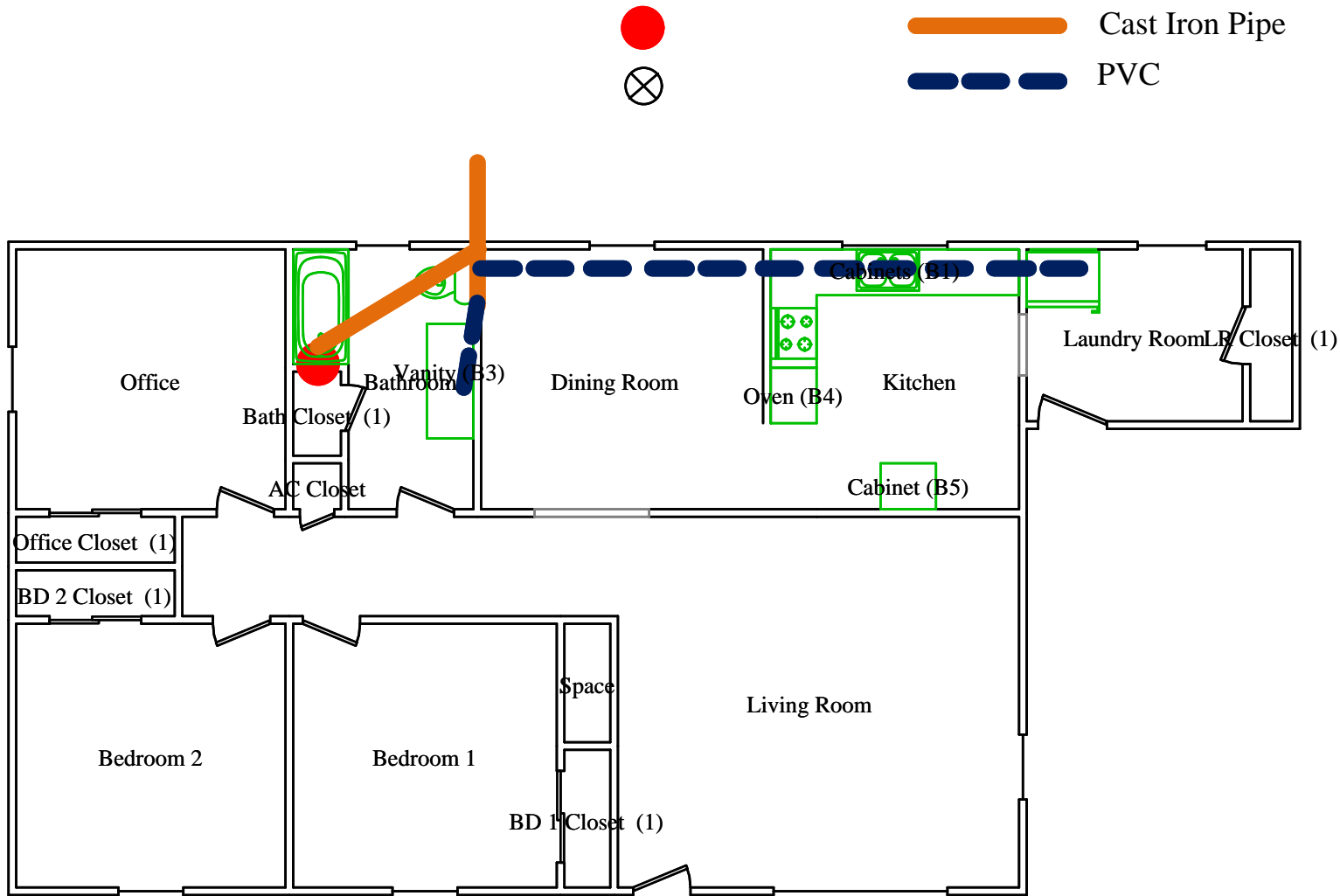
EARNED MASTER MECHANICAL LICENSE (CMC-A) IN TN

2 - DIAGRAM OF HOUSE AND PLUMBING SYSTEM



N
↑

Main Level



Plumbing Diagram

3 - DRAINAGE REPORT AND PHOTOS



DRAINGO OF MISSISSIPPI, LLC
6883 HWY 14, BRIGHTON, TN 38011
draingoplumbing@gmail.com
601-899-0000

PLUMBING REPORT

SUBJECT PROPERTY:

Name William Griffin
Address 128 Poplar St.
City, State, Zip Gadsden, TN 38337

Introduction:

We performed a camera inspection at the above referenced property on the date noted. The purpose of this video inspection was to evaluate the condition of the homes sanitary drainage system and the following are our findings.

System drains into: Septic Tank

Foundation Type: Off Grade / Crawl Space

Cast Iron goes to septic tank and septic tank is under slab of porch. House is conventional

Plumbing System Type: Plumbing system is comprised of both cast iron and PVC.

ANALYSIS OF CAMERA INSPECTION ON: August 10, 2020

OBSERVATIONS

Possible field line issue Broken going into septic tank. It's offset separated at the tank.

The interior of the cast iron drainage line is extremely rough and jagged.

LOCATIONS OBSERVED

Under porch slab



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DAMAGE IDENTIFIED:

MASTER BATHROOM: Cabinet Damage or other wood damage

CONCLUSION:

We believe the existing pipes should be repaired.

Additional Comments:

Only bathroom with Cast Iron. It was grooved and deteriorated and we recommend replacing the Cast Iron. Much of the piping is PVC throughout the rest of the home. Vent to Master Bathroom is Cast Iron and should be replaced.



ESTIMATED COST TO RE-PLUMB SANITARY DRAIN LINES TO PVC: \$9,952.00

Thanks for using our services,

Draingo Plumbing

All observations are the opinion of the Contractor. Opinions are based on collected information and if new information becomes available the Contractor reserves the right to change this opinion.

PICTURES WITH DESCRIPTIONS

| PHOTO | DESCRIPTION |
|--|-------------|
|  | 1. |
|  | 2. |



3.

PHOTO

DESCRIPTION



4.



5.

4 - DRAINGO ESTIMATE

DRAINGO OF MISSISSIPPI

ESTIMATE

6883 HWY 14

BRIGHTON TN 38011

Phone: 601) 899-0000

INVOICE #

DATE

9691803

6/9/2020

CUSTOMER

USA DAMAGE RESPONSE TEAM

WILLIAM GRIFFIN

128 POPLAR ST

GADSDEN TN 38337

CUSTOMER ID

TERMS

564

| DESCRIPTION | QTY | UNIT PRICE | AMOUNT |
|---|-----|--------------|--------------------|
| REMOVE AND SET ALL FIXTURES | 2 | 745.00 | 1,490.00 |
| CREATE ACCESS AND REMOVE CAST IRON PIPE | 16 | 45.00 | 720.00 |
| INSTALL SANITARY PIPE LABOR | 16 | 81.00 | 1,296.00 |
| TRASH CONTAINER | 1 | 900.00 | 900.00 |
| PREPARING PLANS, PLUMBING PERMIT, INSPECTIONS AND SUBMISSIONS | 1 | 1,800.00 | 1,800.00 |
| SUPPORT HANGERS | 1 | 450.00 | 450.00 |
| TRAVEL TIME TO THE LOCATION | 4 | 100.00 | 400.00 |
| MATERIAL INCLUDING PVC SCH 40 PIPE AND FITTINGS | 3 | 150.00 | 450.00 |
| VENT STACK & WASTE ARM INSTALL | 2 | 823.00 | 1,646.00 |
| CUT CONCRETE, REMOVE AND DISCARD (APPROX FT) | 8 | 100.00 | 800.00 |
| | | | - |
| | | | - |
| | | | - |
| <i>Thank you for your business!</i> | | SUBTOTAL | 9,952.00 |
| | | TAX RATE | 0.000% |
| | | TAX | - |
| | | TOTAL | \$ 9,952.00 |

If you have any questions about this invoice, please contact
DGMS 601-899-0000 DRAINGOPLUMBING@GMAIL.COM